

Exhibit E

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 JOSEPH JERMANO and DORY ANN
6 JERMANO, as parents and natural
7 guardian of MIA JERMANO, et al,
8 Plaintiffs,
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10 -vs- Case No. 13-CV-10610
11

12 GRACO CHILDREN'S PRODUCTS, INC.,
13 Defendant.
14 _____/

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17 DEPONENT: AMANDA WATTS
18 DATE: Thursday, August 21, 2014
19 TIME: 11:01 a.m.
20 LOCATION: COMFORT INN
21 6500 East Albain Road
22 Monroe Charter Township, Michigan
23 REPORTER: Karen Fortna, CRR/RMR/RPR/CSR-5067
24 JOB NO: 216697-B
25

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1 APPEARANCES:

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3 THOMAS, GARVEY & GARVEY

4 By: Mr. Andrew J. Miller

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8 Appearing on behalf of the Plaintiffs

9

10 SCHIFF HARDIN

11 By: Mr. Davin M. Reust

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13 Chicago, Illinois 60606

14 312.258.5500

15 Appearing on behalf of the Defendant

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3 W I T N E S S

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7 Examination by Mr. Reust

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8 Examination by Mr. Miller

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9 Further examination by Mr. Reust

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E X H I B I T S

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EXHIBIT

DESCRIPTION

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None offered.

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1 A. Yes, I believe so. I'm horrible with --

2 Q. That's okay.

3 Had you been on Telegraph?

4 A. Yeah, but then right when we got to the split right
5 there, Monroe Street.

6 Q. Do you recall what the traffic was like at that
7 intersection?

8 A. I don't remember.

9 Q. Okay. Do you recall how fast you were going?

10 A. Nope. Now I pay attention to how people are
11 driving.

12 Q. Do you believe Andrew was driving the speed limit,
13 faster, slower?

14 A. Faster.

15 Q. Do you have any idea as to how much faster?

16 A. Probably about 75, 80.

17 Q. Why do you think that he was going faster?

18 A. Just because of the impact, I mean, you know, how
19 fast it happened. It was, you know, outrageous.

20 Q. Okay. So can you -- well, strike that.

21 Leading up to -- when you were in the car
22 for those 15 to 20 minutes approximately, do you
23 recall any conversations that anybody was having in
24 the car?

25 A. Yeah, we were just talking about life.

1 Q. Can you walk me through and just describe generally
2 what happened from the time that you left Nick
3 Grassel's house until the accident occurred?

4 A. Like from when we left to when the accident
5 happened, like you want to know how the accident
6 and everything happened?

7 Q. Yeah.

8 A. Okay. Well, we were driving down Telegraph. I
9 don't know if he just blew the yellow light or if
10 there was a yellow light, whatever happened. Well,
11 coming around that corner, he clipped the back of
12 the 2007 Charger, which had spun us around -- and
13 I'm awake for the whole entire thing.

14 On my right-hand side, as I'm spinning, is
15 a ditch, and it crossed my mind of me pulling the
16 wheel and going to the ditch and just me getting
17 hurt -- because my little sister was in the back
18 seat -- or just let it happen. And by the time I
19 just had made the decision, I seen headlights
20 coming towards me. And then after that, I don't
21 remember.

22 Q. Okay. So I'm going to break it down just a little
23 bit, too.

24 Did you see the Charger before the impact?

25 A. No.